

1 Whereas certain impediments outside the parties control have prevented plaintiff from
2 obtaining records essential to completing discovery and depositions of the defendant police officers;

3 Whereas certain impediments outside the parties control have prevented defendants from
4 obtaining essential medical and psychiatric records of plaintiff, without which defendants cannot
5 complete expert discovery;

6 Whereas the parties agree that receipt of these respective records is essential to completing
7 both fact and expert discovery;

8 Whereas, the parties have met and conferred and agree that the deadline to complete factual
9 discovery should be extended to until June 27, 2008;

10 Whereas the parties have met and conferred and agree that the deadline to make expert
11 disclosures should be extended to July 25, 2008;

12 Whereas the parties have met and conferred and agree that the deadline to complete expert
13 discovery should be extended to until October 10, 2008;

14 Whereas, this proposed modified discovery schedule will not change or upset the dates set by
15 the court for jury trial in this matter.

16 IT IS SO STIPULATED BY THE PARTIES:


17 Dated: June 5, 2008

DENNIS J. HERRERA
City Attorney
SEAN F. CONNOLLY
Deputy City Attorney

20 By: _____
21 SEAN F. CONNOLLY
22 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO, et al.

23 Dated: June 5, 2008

BENJAMIN NISENBAUM, ESQ.
JOHN BURRIS, ESQ.
Law Officers of John Burris

25 By:  _____
26 JOHN BURRIS
27 Attorney for Plaintiff
ESTHER HWANG